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November 28, 2005

VIA ELECTRONIC MAIL

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

> **Re:** **WC Dockets Nos. 05-196 and 04-36**
> **Compliance Letter**

Dear Ms. Dortch:

SNiP LiNK LLC ("SNiP LiNK"), by its attorney, respectfully files the attached "Compliance Letter" in accordance with the requirements set forth in the Federal Communication Commission's *First Report and Order and Notice of Proposed Rulemaking* in WC Docket No. 04-37 and WC Docket No. 05-196, FCC 05-166 (rel. June 3, 2005) and the Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005). Please feel free to contact the undersigned if you have any questions or need additional information.

Sincerely,

Steven A. Augustino
Counsel for SNiP LiNK LLC

Enclosure

SNiP LiNK LLC ("SNiP LiNK") submits the following 911 Compliance Letter ("Compliance Letter"), which contains all of the information described in the Federal Communications Commission's ("Commission" or "FCC") Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005) ("Public Notice").

SNiP LiNK 's 911 Solution

SNiP LiNK provides 911 service, in compliance with the rules established in the Commission's *VoIP 911 Order*[1] to 98% of its customers. SNiP LiNK serves 2% of its customers with VoIP Service in areas outside its facilities-based footprint ("remote customers"). At this time, SNiP LiNK is not able to provide 911 or E911 service to these remote customers. SNiP LiNK is, however, working with a third party service provider to provide E911 connectivity. SNiP LiNK expects that it will have these customers connected within approximately four (4) weeks.

911 Routing Information/Connectivity to Wireline E911 Network

With the exception of the remote customers described above, SNiP LiNK transmits "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."[2] As of November 28, 2005, SNiP LiNK provides 911 coverage directly in every county in New Jersey, and indirectly, through Verizon, in Pennsylvania and Delaware. In New Jersey, SNiP LiNK maintains diverse and redundant connections to four (4) separate Selective Routers providing E911 coverage for all LATAs and counties. In Pennsylvania and Delaware, SNiP LiNK forwards the 911 calls to a Verizon Selective Router assigned to the specific customer.

For the remote customers, SNiP LiNK will route all 911 calls to a third party service provider for processing. The provider will determine the appropriate PSAP for the customer's registered location and route, via its network, the call to the appropriate PSAP. As discussed above, SNiP LiNK expects to have this service in place in approximately four weeks.

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[1]   *In re: IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005) ("VoIP 911 Order").

[2]   *Public Notice, Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 at 3 (rel. Nov. 7, 2005) ("Public Notice").

Transmission of ANI and Registered Location Information

SNiP LiNK transmits, via the Wireline E911 Network, the 911 caller's registered location and automatic numbering information ("ANI") to all answering points that are capable of receiving and processing the information. As of November 28, 2005, 100% of the answering points within SNiP LiNK's service area are capable of receiving and processing ANI and registered location information.   Of SNiP LiNK's customers, 98% have their registered location information and ANI transmitted to answering points capable of processing that information. Once the third party service provider begins offering service to the remote customers described above, SNiP LiNK will transit the required automatic numbering and registered location information for 100% of its customers.

Obtaining Initial Registered Location Information

SNiP LiNK provides VoIP service for fixed location applications. Its services cannot be used on a nomadic basis. As a result, the registered location is the same as the service address in all instances. In addition, a customer may not change the service address without contacting SNiP LiNK, which installs all equipment used for the VoIP service on its customer's premises. SNiP LiNK, therefore, has the registered location information for all of its customers, in compliance with the *Commission's VoIP 911 Order*.

Obtaining Updated Registered Location Information

As discussed above, SNiP LiNK's services cannot be used on a nomadic basis. Therefore, SNiP LiNK will always have updated registered location information for its customers based on the address where they install the service. Currently there is no method for the remote customers to update their location information. As SNiP LiNK begins using the third party E911 service provider, all VoIP customers will be able to update their registered location information in real time via a web portal.

Technical Solution for Nomadic Subscribers

Not applicable. SNiP LiNK's service cannot be used nomadically.